

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA
vs.
DONNELL RUSSELL,
Defendant.

No. 20-cr-538 (PGG)

**DEFENDANT RUSSELL'S NOTICE OF MOTION *IN LIMINE* TO
PRECLUDE EVIDENCE RELATING TO MR. KELLY'S PROSECUTION
AND MR. RUSSELL'S EDNY PROSECUTION (MIL NO. 5)**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, defendant Donnell Russell, pursuant to Rules 402 and 403 of the Federal Rules of Evidence, will move the Court, before the Honorable Paul G. Gardephe at the United States Courthouse, 500 Pearl Street, Courtroom 705, New York, New York 10007, for an Order precluding evidence relating to Mr. Kelly's prosecution and Mr. Russell's EDNY prosecution.

Dated: June 27, 2022

/s/ Michael G. Freedman
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Attorney for Defendant Donnell Russell

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2022, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Michael G. Freedman
Michael G. Freedman